



GOVERNMENT OF THE DISTRICT OF COLUMBIA OFFICE OF THE CHIEF FINANCIAL OFFICER

DOING BUSINESS WITH INTEGRITY

Introduction

You are receiving this because you are either a frequent customer, a contractor, or a vendor who does repeated business with the Office of the Chief Financial Office (OCFO) or you are an organization or individual outside the OCFO with whom we frequently interact.

Purpose

Our purpose is to advise you of the high expectation of integrity that we strive to bring to bear in all of our business relationships.

Environment of Trust

The Office of the Chief Financial Officer for the District of Columbia is committed to maintaining working relationships with all of our business partners, clients, and customers that are founded on fair and honest exchanges in all of our business interactions. Our employees are held to high standards of ethical behavior in the conduct of their official business. We want to share these expectations of ethical business practices with you to ensure that our business relationships are conducted with the highest level of honesty and integrity.

Expectations of OCFO Employees

Bribes and Kickbacks

The OCFO Code of Conduct imparts two fundamental values for employees:

1. Employees should avoid any conduct that constitutes a real conflict of interest or that would create the appearance of a conflict of interest.
2. Employees should not use their official position to secure unwarranted privileges, awards, or exemptions for themselves or others.

The key concept is that employees should not accept anything of value, in addition to their government salaries, for the performance of their duties.

Confidentiality of Financial and Other Information

We expect our employees to maintain absolute confidentiality of all information that they obtain, observe, or create concerning the financial affairs of those we do business with. We vigorously investigate any compromise of confidentiality by employees or any attempts to improperly obtain such information by private parties or businesses.



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Conflicts of Interest

We expect our employees to avoid conflicts of interest or the appearance of conflicts of interest. A particularly sensitive issue for government employees is the offer of employment with a company doing business with the OCFO. At any point when a government employee is considering employment with a private company that has a business relationship with the government, that employee must discontinue work on any assignment involving that company or face the very real possibility of violating Conflict of Interests statutes. This could also jeopardize the company's eligibility to be awarded government contracts.

Employees are also expressly forbidden from performing official duties in situations involving friends, relatives, or persons or businesses with whom they, or their family members, have a financial relationship. At any point where such a relationship is discovered or develops, the employee must discontinue their involvement in the official matter. For the employee and the business entity to continue to conduct official business after such a conflict is evident, would be inappropriate and possibly illegal.

Expectations of Vendors, Customers, and Business Associates

Gratuities

Nothing is more rewarding than to hear that our staff has provided exemplary service to those with whom we do business. Sometimes, however, the expression of appreciation is made in a form that is inappropriate for government employees to accept. OCFO employees are prohibited by law from accepting money or other things of value as an appreciation for a job well done. Sometimes even the mere offer of something of value may violate bribery and gratuity statutes. A more appropriate expression of gratitude for the service rendered is a letter to the employee's supervisor. If you don't know who that is, you may simply write to the Office of the Chief Financial Officer.

Gifts of food and/or beverages, even during holidays or at other celebratory times, are not acceptable if the giver has a business relationship of any kind with the OCFO. Such offers, while well-intentioned, tend to give the impression of a special relationship between the giver and the government employee(s) receiver. This rule does not apply to offer and acceptance of an insignificant item, such as a soft drink, coffee, donuts, and other modest items of food and refreshments when not offered as part of a meal.

The offer of anything of value in expectation of specific performance by a government employee is a crime, and even the appearance of such an activity should be avoided.

Our employees are instructed to report all offers of bribes or gratuities. Likewise, we encourage that anyone who believes they may have been solicited for a bribe or gratuity should report such a proposal to Internal Security, OCFO, at **202-442-7020**. Allegations of bribery or offers of gratuities are thoroughly investigated by OCFO Internal Security, the D.C. Office of Inspector General, and other law enforcement agencies as appropriate.



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Report Violations to OCFO Internal Security at 202-442-7020

Compliance with Contracting Rules and Regulations

Ensuring compliance with the provisions of contracts is an important expectation of government employees. Even so, we have seen examples where the rules were not followed, usually based on the "need to get the job done." Such behavior puts both the government employee and the contractor in jeopardy. If modifications to existing contracts are necessary, then they should be formally pursued in accordance with OCFO contracting rules and regulations. No work outside the specifications of a contract should be performed without an approved contract modification. Performing work outside of contract specifications or beyond authorized funding, could result in a default for the contractor and denial of payment for such work. In the more extreme cases, failure to comply with contracting regulations could be considered as fraud and may be investigated as a criminal violation.

In Conclusion

We all want the government's business to be conducted fairly, impartially, and with the highest degree of integrity. The best way to ensure that is to report any indication that illegal or administrative misconduct may have occurred. The process of government works best when the playing field is level. The OCFO will not tolerate corruption from within, nor will we tolerate attempts to corrupt the business of government from without. The Internal Security Division of the OCFO is charged with investigating and reporting the results of all allegations of breaches of integrity within the OCFO. Please contact us at 202-442-7020 if you believe that a compromise of integrity has taken place, or notify the Inspector General hotline at (800) 521-1639. You may also contact us and review the full text of the OCFO Employee Code of Conduct at www.cfo.dc.gov under "Integrity and Oversight."

Thank you for your time and attention.

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Working to ensure honesty, integrity, and accountability in the workplace